

STATE OF ALASKA
THE REGULATORY COMMISSION OF ALASKA

Before Commissioners:

Robert A. Doyle, Chairman
John M. Espindola
Keith Kurber II
Robert M. Pickett
Janis W. Wilson

In the Matter of the Petition Filed by OTZ)	U-23-055
TELEPHONE COOPERATIVE, INC. to)	
Move First Point of Switching)	
_____)	

**PREFILED RESPONSIVE TESTIMONY
OF
TONY DEAN**

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1 **I. POSITION AND QUALIFICATIONS**

2 **Q. Please state your name, business address, and current position at GCI**
3 **Communication Corp.**

4 A. My name is Tony Dean. My business address is 1001 Northway Drive, Suite
5 100, Anchorage, AK, 99577. I am the Director of Engineering and Architecture,
6 Voice, Mobility and Operations Support Systems for GCI Communication Corp.
7 ("GCI").

8 **Q. Please briefly describe your professional experience and background.**

9 A. I have approximately 33 years of telecommunications experience with Wireless
10 and Wireline Technologies including exchange and interexchange carrier
11 trunking.¹ During my career, I have held positions as an active duty Air Force
12 Communications Control Specialist and Tester and Complex Translator at US
13 West. I was hired by GCI in April 2000 and have held the positions of Switch
14 Network Technician, Switch Network Engineer, Sr. Manager of Switch
15 Engineering, and Director of Switch Network. I have held my current position
16 of Director of Engineering and Architecture, Voice, Mobility and Operations
17 Support Systems since 2022.

18 **Q. Have you ever provided testimony before the Regulatory Commission of**
19 **Alaska or other regulatory agency?**

20 A. No.

¹ A "trunk" is a communication line between two switching systems.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to describe GCI's intrastate interexchange service and facilities in the OTZ Telephone Cooperative, Inc. study area and the impact to that service and GCI's facilities if OTZ is authorized to change its first point of switching ("FPOS") for the communities of Ambler, Buckland, Deering, Kiana, Kivalina, Kobuk, Kotzebue, Noatak, Noorvik, Selawik, and Shungnak from each community to Anchorage. In the remainder of my testimony, I will (1) describe GCI's intrastate interexchange carrier ("IXC") service and facilities in the OTZ communities, (2) identify the impact to GCI's IXC service and facilities if the Commission approves OTZ's FPOS change, and (3) address the impact on GCI's mobile wireless service should the FPOS change be approved.

III. GCI INTRASTATE IXC SERVICE AND FACILITIES IN OTZ STUDY AREA

Q. Please describe the “first point of switching” in your own words?

A. A local exchange carrier (“LEC”) such as OTZ is generally required to provide access to its local switching equipment so another carrier (an IXC) can provision direct switch connectivity for long distance calls. This allows an interconnecting IXC to avoid paying the LEC for mileage to transport calls to the LEC’s local switch. Essentially, the FPOS is the interconnection point between the LEC and IXC.

1 **Q. Does GCI provide IXC service to customers in the OTZ communities?**

2 A. Yes. GCI holds Certificate of Public Convenience and Necessity 419 to provide
3 intrastate IXC service in the State of Alaska, including the OTZ service area.
4 GCI interconnects with OTZ at the FPOS in each of the above communities.
5 The interconnection between the two companies allows 1 + calling by GCI's
6 customers. A customer that has selected GCI as their long distance carrier can
7 make a long distance call between the OTZ communities, or elsewhere in the
8 state, by dialing 1 + the number they are calling. In turn, GCI terminates all long
9 distance calls on its network to the local numbers in the OTZ communities.
10 Telephone calls between the communities are long distance calls because each
11 community is a separate local exchange. GCI's interexchange facilities also
12 carry toll free 8YY traffic for all customers in the communities.

13 **Q. Does GCI use its own facilities to provide this IXC service?**

14 A. Yes. GCI has trunking facilities in each of the communities that it uses to
15 provide IXC service. GCI uses its TERRA Microwave system to provide
16 terrestrial-based long distance service in Buckland, Kiana, Noorvik, Noatak, and
17 Selawik. GCI serves Kotzebue over fiber and anticipates serving Deering and
18 Kivalina over fiber early this year (2024). GCI provides IXC service using
19 satellite for Ambler, Kobuk, and Shungnak. Both Rick Hitz, who is testifying
20 on behalf of GCI, and OTZ's Kelly Williams describe the routing for long
21 distance calls to and from these communities.

22 **Q. Do you have a correction to Mr. Williams's description of the routing used**

1 **by GCI for IXC service to the communities?**

2 A. Yes, on page 6 of his testimony Mr. Williams states that GCI routes
3 interexchange calls to and from its switch in Anchorage over satellite. That is
4 not correct. As described above, GCI currently provides IXC service over
5 terrestrial fiber or microwave in six (soon to be eight) of the communities, not
6 satellite.

7 **IV. IMPACT TO GCI IXC SERVICE IF FPOS CHANGE IS APPROVED**

8 **Q. Please describe your understanding of OTZ's proposed FPOS Change.**

9 A. OTZ is asking for permission to create a tandem switch in Anchorage that IXCs
10 would be required to use to access OTZ's local exchange customers. OTZ would
11 charge for mileage between Anchorage and the switches in each community
12 using its own transport. Carriers will not have the option for direct access to the
13 local switching equipment to use their own transport.

14 **Q. At a high level, please describe the change to GCI's IXC service if the**
15 **Commission approves OTZ's proposed FPOS change.**

16 A. Currently, GCI has direct trunking to each of the OTZ communities for its long
17 distance service. If OTZ is allowed to move the FPOS, then GCI would only be
18 allowed to interconnect with OTZ's tandem in Anchorage for the provision of
19 long distance calls.

20 Changing the FPOS as OTZ proposes would give OTZ a monopoly on
21 transport of long distance calls to and from GCI's customers. Today, GCI carries
22 long distance calls to and from its customers on its own network. If the FPOS

1 is moved to Anchorage, GCI can no longer use its own network for this transport
2 function but must pay OTZ to carry those calls on OTZ's network.

3 As things stand today, all GCI customer long distance calls to a location
4 outside of the OTZ service area will be carried over satellite on OTZ's network
5 to Anchorage and handed off to GCI for termination. Calls on the GCI long
6 distance network destined to the OTZ study area would be routed to the OTZ
7 tandem in Anchorage and carried over OTZ's satellite network to the landline
8 subscribers.

9 **Q. Will there be an impact to the quality of GCI's IXC service if the proposal**
10 **is approved?**

11 A. Yes, the most notable impact will be from a customer experience perspective.
12 All long distance calls would require at least one satellite hop causing a
13 significant delay setting up the call. The calls will suffer from satellite latency.
14 The time it takes for the signal to travel from the earth station to the satellite and
15 then from the satellite to the earth station on the other end is noticeable. With
16 multiple satellite hops the effect is multiplied.

17 In general, GCI anticipates its long distance customers will experience
18 impacts to their service because GCI will be reliant on OTZ's network for
19 delivering GCI's traffic to and from the OTZ study area. Not only will voice
20 quality suffer because of the satellite hops, GCI will be reliant on OTZ for
21 troubleshooting issues and resolving network outages. GCI's experience
22 working with OTZ has often been less than satisfactory and often requires

1 outside technological support. OTZ will have no incentive to improve GCI's
2 customer experience when there are troubleshooting or network issues. Indeed,
3 since OTZ will be trying to get those same customers to sign up for OTZ-LD's
4 service, OTZ's incentive will actually be to not troubleshoot issues that may
5 affect GCI's network because it could influence customers to change service to
6 OTZ-LD.

7 The tandem switch that OTZ will use as the FPOS is a REDCOM Slice
8 2100. This is a small softswitch with limited capacity and a poor reputation with
9 at least one other Alaskan carrier that has utilized this switch.

10 **Q. Mr. Williams has testified that OTZ receives complaints because its**
11 **customers do not get CallerID information on calls from GCI. Could you**
12 **address this?**

13 **A.** Yes. GCI established its network in the OTZ study area using in band trunking
14 based on OTZ's switching capabilities at the time, which would not support
15 CallerID. Subsequently, GCI received notification from OTZ in January 2020
16 that OTZ was SIP² capable, which would allow CallerID information. GCI
17 established a project to convert its IXC trunks in the study area to SIP, but
18 unfortunately OTZ failed to provide the information necessary to complete the
19 project. GCI is currently in the process of upgrading trunking with Alaskan
20 LECs. Caller ID information will be available to customers in the OTZ study

² Session Initial Protocol.

1 area once those upgrades are completed and pending OTZ cooperation.

2 **Q. Mr. Williams also testified that OTZ plans to bring a microwave network**
3 **online in the summer of 2024 with satellites used for redundancy. Will this**
4 **resolve the quality-of-service issues that you have identified?**

5 A. No. It will not resolve the problems associated with OTZ troubleshooting issues
6 and resolving outages on its network. It will also not address the potential issues
7 with the use of the REDCOM Slice switch.

8 **Q. Will a FPOS change result in “stranded” GCI assets?**

9 A. Yes. At a minimum there will be Veraz devices that GCI uses for the IXC trunks
10 to convert from TDM to IP and back for terminating on its long distance switch
11 that will be stranded and no longer used. Additionally, IXC trunking transport
12 to the communities will be disconnected.

13 **V. IMPACT ON GCI MOBILE WIRELESS SERVICES**

14 **Q. Does GCI provide other services to customers in the OTZ study area?**

15 A. Yes, GCI provides wireless service to customers in the OTZ study area. For this
16 service, GCI provides a local wireless interconnect from its wireless switch to
17 each of OTZ’s locations. Mobile-originated calls on GCI’s wireless network are
18 terminated to OTZ’s local landlines, and in turn, calls from the LEC’s local
19 landlines are routed to GCI’s local wireless numbers from OTZ. Currently, in
20 these local calling scenarios, there are no satellite hops.

21 **Q. Will the change affect GCI’s mobile wireless services.**

22 A. OTZ’s current proposal is somewhat unusual in that they are leaving the current

1 switches in each community. However, it is possible, if not certain, that OTZ
2 will try to eliminate the wireless connections in each village in the future when
3 they change the switches in each village, just as it is trying to eliminate the
4 connection for long distance calls now. That could have a major impact on
5 mobile wireless services, introducing satellite hops on “local” calls between a
6 mobile phone and a landline, severely degrading the voice quality. This would
7 have a major impact on mobile wireless services and would not be subject to
8 review under the Commission’s FPOS policy.

9 **VI. CONCLUSION**

10 **Q. Does this conclude your testimony?**

11 **A. Yes.**